

UNITED STATES DISTRICT COURT

for the

Central District of California

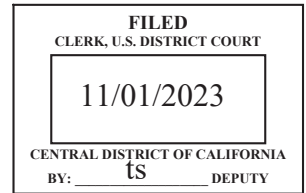
United States of America

v.

RYAN JACOBS,

Defendant.

Case No. 2:23-mj-05658-duty



**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of October 19, 2023, in the county of Los Angeles in the Central District of California, the defendants violated:

Code Section

18 U.S.C. § 875(c):

Offense Description

Transmission of Threat to Injure the Person
of Another in Interstate Commerce

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/

Complainant's signature

Ryan Scheeler, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: November 1, 2023



Judge's signature

City and state: Los Angeles, California

Hon. Stephanie Christensen

Printed name and title

AFFIDAVIT

I, Ryan Scheeler, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint against Ryan Jacobs ("JACOBS") for a violation of 18 U.S.C. § 875(c) (threat by interstate communications).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since October 2017. I am currently assigned to a Domestic Terrorism and Weapons of Mass Destruction squad of the Los Angeles Field Office, where I primarily investigate people who commit violent criminal acts in furtherance of their political or social ideology, and investigate threats associated with the nefarious use of chemical, biological, radiological, nuclear, and explosive materials. I completed the FBI Academy in Quantico, Virginia, and have received both formal and informal training

from the FBI and other institutions regarding threats associated with political and social ideology. In my capacity as a Special Agent, I have employed various investigative techniques, including the execution of warrants, to investigate crimes involving domestic terrorism and threats.

III. SUMMARY OF PROBABLE CAUSE

4. On October 19, 2023, the Anti-Defamation League ("ADL") became aware of threatening online social media posts on X, the social networking platform formerly known as Twitter, in which the account user threatened they were going to kill the Director of the ADL, every single person at the ADL, to start a real holocaust, and stated "@FBI you better come stop me because I'm intent on a real Holocaust against the ADL Jews." As discussed below, the FBI later identified the user of the account as JACOBS.

5. On October 31, 2023, FBI Special Agents obtained a search warrant (2:23-MJ-05615) for JACOBS's residence in Marina Del Rey, CA. The warrant was executed on November 1, 2023. During the course of the search warrant, a voluntary non-custodial interview was conducted with JACOBS. JACOBS was shown printouts of the threatening social media posts, the same posts as the images in Paragraph 7 below. JACOBS confirmed those were the Tweets he posted, using the X account username in the images.

IV. STATEMENT OF PROBABLE CAUSE

6. Based on my review of law enforcement reports, conversations with law enforcement officers, and my own knowledge of the investigation, I am aware of the following:

A. The Anti-Defamation League Identifies X Posts Threatening Violence to the Organization and Individuals

7. Based on my review of law enforcement reports and conversations with law enforcement officers, I learned that on October 19, 2023, the Los Angeles Police Department ("LAPD") received a notification from the Anti-Defamation League ("ADL") regarding social media posts on X (formerly known as "Twitter") threatening the ADL. The following posts were observed by the ADL, authored by @rj1299599:



A screenshot of a social media post. At the top left is a circular profile picture of a person with dark hair. To the right of the picture is the name "RJ1299699" in bold, and below it is the handle "@rj1299599". To the right of the handle is a three-dot menu icon. The text of the post reads: "I'm going to kill Jonathan Greenblatt and every single person at the ADL. Will be the start of a real holohocaust ho ho ho not fake like the fake 6 million (Red Cross estimators put the number at ~200k Ashkenazi Jews lost)". At the bottom left of the post, it says "3:14 PM · Oct 19, 2023 · 2 Views".

RJ1299699
@rj1299599

I'm going to kill Jonathan Greenblatt and every single person at the ADL. Will be the start of a real holohocaust ho ho ho not fake like the fake 6 million (Red Cross estimators put the number at ~200k Ashkenazi Jews lost)

3:14 PM · Oct 19, 2023 · 2 Views



A screenshot of a social media post. At the top left is a circular profile picture of a person with dark hair. To the right of the picture is the name "RJ1299699" in bold, and below it is the handle "@rj1299599". To the right of the handle is a three-dot menu icon. The text of the post reads: "@FBI you better come stop me because I'm intent on a real Holocaust against the ADL Jews. Gas chambers and all". At the bottom left of the post, it says "3:35 PM · Oct 19, 2023 · 3 Views".

RJ1299699
@rj1299599

@FBI you better come stop me because I'm intent on a real Holocaust against the ADL Jews. Gas chambers and all

3:35 PM · Oct 19, 2023 · 3 Views

8. The LAPD contacted the FBI Los Angeles Field Office and provided them with the information in order to monitor and assess the situation.

B. The FBI Obtains Information from Twitter/X on the Social Media Account

9. On October 20, 2023, the FBI sent an Emergency Disclosure Request ("EDR") to X, for the X account identified in the threatening posts, @rj1299599. X provided account results pursuant to the Emergency Disclosure Request. Based on my training and experience, speaking with other law enforcement personnel, and my own open source research, I know that X is a social media platform with servers located outside the State of California.

10. I reviewed the EDR results, which included an email address associated with the account @rj1299599, of rgjacobs@tutanota.com. The EDR results also included an IP address of 172.117.51.59 which is associated to the account @rj1299599 and a X login session on October 19, 2023. The date of the X session on October 19, 2023 corresponds with the date of the threatening posts.

C. The FBI Identifies an Individual Associated to the X Account

11. On October 20, 2023, I conducted an open source database search of the provided IP address of 172.117.51.59. I learned that the internet service provider of the IP address was Charter Communications Inc.

12. I sent an EDR to Charter Communications Inc., for subscriber information associated to the IP address

172.117.51.59. Charter Communications Inc. provided subscriber information pursuant to the EDR.

13. Based on my conversation with Charter Communications Inc., service for the IP address resolved back to the physical address 4335 Marina City Drive, Unit 734, Marina Del Rey, CA 90292, and to an individual named Linda Olson, also known as Linda Olson Jacobs.

14. I conducted open source database searches on the name Linda Olson and the 4335 Marina City Drive, Unit 734, Marina Del Rey, CA 90292 address. Based on my review of the results of the database searches, I learned that another individual was associated to the 4335 Marina City Drive, Unit 734, Marina Del Rey address, named Ryan George Jacobs (JACOBS).

D. JACOBS' Associations to the Social Media Account

15. Based on my review of account information from the social media company, the internet service provider, and the social media account itself, the following observations have been made:

16. The email address, rgjacobs@tutanota.com, associated with the Twitter account @rjl299599 that made the threatening posts, contains the same initials and last name as JACOBS.

17. The Twitter/X account username that posted the threats, @rjl299599, contains the same first and last name initials as JACOBS.

18. The internet service address for the IP address associated to the Twitter/X account that made the threatening

posts resolves back to the 4335 Marina City Drive, Unit 734, Marina Del Rey address, which is associated to JACOBS.

E. JACOBS's Associations to the Target Premise of the Search Warrant

19. Based on my conversation with a Los Angeles County Sheriffs Department (LASD) Detective and FBI Task Force Officer (TFO) on October 27, 2023, I know that the TFO spoke via a phone call with JACOBS' father on October 27, 2023. JACOBS' father stated that he was currently paying for JACOBS' apartment, which the father stated was at 4170 Admiralty Way, Unit 332, Marina Del Rey, CA 90292. JACOBS' father stated that JACOBS resided at the address 4170 Admiralty Way, Unit 332, Marina Del Rey, CA 90292.

20. On October 30, 2023, I interviewed the apartment Manager of 4170 Admiralty Way apartments. According to the manager, who searched the apartment computer system, JACOBS' was residing at 4170 Admiralty Way, in Unit 332, and had been there since June 2023. The manager provided a printout of tenant information from the apartment computer system, which showed the name Steven Jacobs on the lease for Unit 332, with "(son Ryan)" in parentheses. The manager stated that the father was heavily involved in setting up the lease for the apartment for JACOBS. I am aware from database checks that Steven Jacobs is the father of JACOBS.

F. JACOBS' MENTAL HEALTH

21. Additionally, I know that during the October 27, 2023 conversation with JACOBS's father mentioned above in paragraph 19, that law enforcement learned these additional facts.

22. JACOBS has been diagnosed with schizophrenia. Additionally, around the date of the posting of the messages on X on October 19, 2023, the defendant was committed to a facility for the treatment of schizophrenia around approximately October 18 or 19, 2023.

G. Execution of the Federal Search Warrant and Interview of JACOBS

23. On October 31, 2023, FBI Special Agents obtained a search warrant (2:23-MJ-05615) for JACOBS's residence in Marina Del Rey, CA. The warrant was executed on November 1, 2023. I was present during the execution of the search warrant. During the course of the search warrant, I was present during a voluntary non-custodial interview of JACOBS. JACOBS was shown printouts of the threatening social media posts, the same posts as the images in Paragraph 7 above. JACOBS confirmed those were the Tweets he posted, using the X account username in the images.

V. Conclusion

42. Based on the foregoing facts and opinions, and on my training and experience, I believe there is probable cause to believe that JACOBS violated 18 USC 875(c): threat by interstate communication.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 1st day of
November, 2023.



HON. STEPHANIE CHRISTENSEN
UNITED STATES MAGISTRATE JUDGE